

# SDE

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## CIVIL ENGINEERING

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Improvement Plans

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Boundary Adjustments

**Subject: Former TM 5254 and current TPM 21193 and BA12-0009**

The project proposes a Minor Subdivision (4 parcels and a remainder) and a Boundary Adjustment (4 parcels) to be filed concurrently on the subject property to the north of the Minor Subdivision and under the same ownership. The attached study reviews both proposals. Originally the proposed project was submitted as TM 5254. This TM was withdrawn and a new application for TPM 21193 and BA 12-0009 was submitted for review and processing by the County of San Diego.

Boundary Adjustment (BA 12-0009) reconfigures four existing parcels created per TPM14192 into 42.83, 46.75, 30.90 acres and the southern parcel is 110.03 acres. TPM 21193 proposes 4 parcels and a remainder on the southern parcel. APN 102-102-07 was included in the boundary of TM 5254 but it has been removed from the current proposal.

The pad locations and environmental impact review analyzed in this report for TM 5254 has not significantly changed with this new application.

Sincerely,



Ivan R. Fox PE

**SDC DPLU RCVD 03-01-12**

**TPM21193**

AGRICULTURAL ANALYSIS  
TM 5284 Rpl 4/LOG ER01-004A

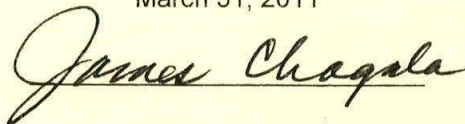
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March 31, 2011

A handwritten signature in cursive script that reads "James Chagala". The signature is written in dark ink and is positioned below the printed name and date.

SDC DPLU RCVD 03-01-12  
**TPM21193**

AGRICULTURAL ANALYSIS  
TM 5284 Rpl 4/LOG ER01-004A

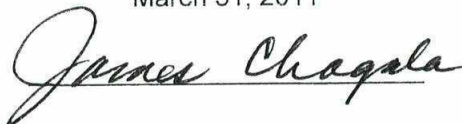
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## SUMMARY OF FINDINGS

- A. The project, when compared to against the appropriate Thresholds of Significance, will not have a significant impact to agriculture in San Diego County based upon the following findings.
- The project will not result in the conversion of Soils of Prime Agricultural Farmland.
  - All of the soils on the subject property are rated as not suitable for agriculture by the Soils Conservation Service.
  - The project will not result in the conversion of Prime Farmland or Farmland of Statewide Importance.
  - The project will establish parcels sizes that can support agriculture in the future.
  - The project will not conflict with agricultural zoning or use regulations.
  - The project will not result in a conflict with a County Agricultural Preserve.
  - The project will not result in a conflict with a land conservation contract.
  - The density proposed by the project will not have an adverse significant impact on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.
  - A significant proportion of the existing agriculture on the subject property will not be directly impacted through building pads, roads, or driveways.
  - This project, in conjunction with other existing and proposed projects, would not have an impact to agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.
  - Application of the Department of Conservation LESA model indicates that this proposal will not have a significant impact to agricultural resources.

## I. INTRODUCTION

### A. Overview of the Project:

This project proposes a Major Subdivision and a Boundary Adjustment to be filed concurrently on subject property to the north of this Subdivision and under the same ownership. As such, this study will be reviewing both proposals, which occupy 262.5 acres. The Major Subdivision proposes 7 parcels on 153.9 acres with parcels ranging in size from 20.00 to 24.64 acres gross and a density of one dwelling unit per 21.98 acres gross. The Boundary Adjustment involves 2 parcels of 34.2 and 74.4 acres respectively. The project is located primarily in the northern De Luz Area (See Figure 1, Regional Location). More specifically, it is located east of the intersection of Harris Trail and Conquistador Road (See Figure 2, Community Location). References to "the subject property" will include both the Major Subdivision and Boundary Adjustment unless specifically noted.

There will be no other discretionary permits required for implementation.

### B. San Diego County General Plan and Zoning:

The subject property is within the Estate Development Area (EDA) and the Environmentally Constrained (ECA) Regional Plan Category of the San Diego County Regional Land Use Element (See Figure 3, Regional Category). It is located in both the De Luz Subregional Planning Area and the Fallbrook Community Planning Area and has plan designations of (18) Multiple Rural Use and (20) Agricultural Preserve (See Figure 4, Plan Designations). The subject property is currently classified with the A70 Use Regulation with 4 acre, 8 acre, and 10-acre minimum lot sizes (See Figure 5, Zone Classifications).

### C. Characteristics of the Subject property:

The subject property generally slopes from the west, with elevations as high as 1200 feet in the western central area to 550 feet in the far eastern area.

The project area has approximately all of its area currently in agriculture, with the remaining area vacant. Most of the groves were planted in the 1960's and 1970's and are 30-40 years old. Parts of the grove have been trimmed due to their age.

There are currently several agricultural buildings on the site.

After the subdivision and boundary adjustment, the remaining avocado grove on site will be divided among the individual subject property owners and each owner will be responsible for their portion of the grove. The existing well will come under the ownership of that individual who purchases the subject property where it is now located. All other parcels will be provided with water from the Fallbrook Public Utilities District. The existing irrigation system will be left in tact except for alterations needed to operate the system on individual parcels, with connections to the imported water.

#### D. Characteristics of the Surrounding Area

##### 1. Land Use

The area in the immediate vicinity of the project is characterized by slopes generally in excess of 25%. Additionally there is a combination of agricultural uses, chaparral, and coastal sage scrub in the southern reaches.

##### 2. Zoning and General Plan

###### Zoning:

In terms of the surrounding area, subject property to the west and southeast is zoned A70 (4) which is a light agricultural zone with a 4 acre minimum parcel size. To the south and north the area is zoned A70 (8) and to the east is the S80 (4) Open Space Zone.

###### General Plan:

The surrounding area is located within the De Luz Subregional Plan and the Fallbrook Planning Area and all of the subject property is located within the EDA Estate Development Area Regional Category. Additionally subject property to the west, north, east, and southeast has a community plan designation of (18) Multiple Rural Use. Subject property to the east and southeast has a community plan designation of (22) Public/Semi-Public.

#### E. Methods and Survey Limitations:

##### 1. Study Area:

The study area includes the subject property to be developed, as well as all parcel that lie whole or in part within 1320 feet of the perimeter of the subject property (See Figure 6). The subject property comprises 262.5

acres of this area, while the remainder constitutes 1222.7 acres for a total of 1485.19 acres. Previous references to surrounding area refer to the same properties as the study area. The Tentative Map for this project shows adjacent ownership which is not a part of this subdivision.

## 2. Method:

Agricultural uses and other land uses were determined through a combination of several sources. The primary source was a digitized aerial photo taken in 2009. This photo was enlarged so that agricultural areas as well as the types of agriculture could be identified. Additionally, there were discussions with the grove manager. Please note that the measurements taken from the aerial photo are two-dimensional and do not account for topography. Therefore there may be slight deviations in some of the acreage figures in rough terrain. However, this method was deemed sufficiently accurate for the broad conclusions desired in this analysis.

Agricultural areas affected were determined by superimposing the areas in agricultural use over the Tentative Map and using a digital planimeter to measure pads, driveways, streets, and Building Limitation Zones per the Fire Plan. Slopes and fills for streets and pads, and biological open space easements, where appropriate, were also included in these measurements. Additionally, the Fire Plan calls for a "Zone A" around the perimeter of the pads. This Zone does not permit the growing of citrus or avocados. Areas within this zone were considered direct impacts to agriculture since the existing agriculture will need to be removed. However, Zone A was not included in calculations of Unique Farmland lost to non-agricultural uses, since this area can still be utilized for some forms of agriculture after development of this project. Further explanations of the how the impacts of Zone A were treated are found in the appropriate sections of this report.

Soils information was determined through the San Diego County Important Farmland Map, produced by the California Department of Conservation, and the Soil Survey for the San Diego Area produced by the U.S. Department of Agriculture Soil Conservation Service.

Climatic Data was determined through use of the University of California Extension Service publication entitled Climates of San Diego County Agricultural Relationships, as well as information provided in the above mentioned Soils Survey.

### 3. Limitations:

The method was limited by several factors. First, the latest available aerial photos were taken in 2009 so that some new planting could have occurred during that time. While this was not a problem for the subject property, there may be some new plantings on other properties that were not included in some of the acreage calculations.

Second, acreages were measured through the use of a digital planimeter. All measurements were taken 3 times and the results averaged, in accordance with accepted practice for this type of instrument. For the broad assumptions of this report, this level of precision is more than sufficient. However, it should be understood that the acreage figures are only close approximations.

### F. Thresholds of Significance:

A determination as to the degree of significance of the effects, if any, of each of the following thresholds shall be made. The results of these determinations are to be considered guidelines that, when viewed as a whole in the context of each project, will determine whether a project has a significant effect to agricultural resources.

1. The project will result in the conversion of:
  - a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).
  - b. Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.
2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.
3. The project will result in a conflict in the study area with agricultural zoning or use regulations.
4. The project will result in a conflict in the study area with a County Agricultural Preserve.
5. The project will result in a conflict in the study area with a land conservation contract.

6. The density proposed by the project will have an adverse significant effect on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.

7. A significant proportion of the existing agriculture on the subject property will be directly affected through building pads roads, or driveways.

8. This project, in conjunction with other existing and proposed projects, would have an effect to agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.

9. Application of the LESA Model indicates that the proposal will have a significant impact to agricultural resources.

## II. SURVEY RESULTS

The following is the data generated through this survey with some preliminary analysis. Corresponding conclusions will be found in Section III.

### A. County General Plan—Agricultural Designations:

The San Diego County General Plan has two designations devoted to agriculture. First is the (19) Intensive Agriculture, and second is the (20) Agricultural Preserves. The subject property has 207 acres or 79% designated as (20) Agricultural Preserves. None of the other property within the study area lies within one of these agricultural designations.

### B. County Agricultural Preserves:

The subject property has 231.5 acres in Agricultural Preserve #80 See Figure 7. None of the other property within the study area lies within an Agricultural Preserve. The property within the Agricultural Preserve is not subject to a Land Conservation Contract.

### C. Land Conservation Contracts:

There are no properties subject to a land conservation contract within the study area. There was previously a Land Conservation Contract (AP 77-17) on parts of the subject property, but the notice of non-renewal was recorded on September 16, 1981. Thus the contract terminated January 1, 1992.

### D. Parcelization:

A review of parcelization within the study area indicates that there are 44 assessor's parcels within the study area, not including the subject property or assessor's parcels created for roadways. These parcels are classified by size on Figure 8 and mapped on Figure 9. Other than one parcel 4-8 acres, all parcels in the study area are 8 acres or larger, with 20 being 8-20 acres, and 23 being in excess of 20 acres.

Since the smallest parcel being proposed is in excess of 20 acres, the densities and parcel sizes of the proposed development are consistent with all of the parcel sizes. Thus the parcel sizes and densities being

proposed would not only be consistent with the current general plan and zoning, but would also not be out of character for the area.

E. Land Use:

In general terms, land uses in the study area are either vacant or low-density residential/agricultural uses. The study area consists of 1485.19 acres and agricultural uses occupy approximately 669.7 acres or 45% of the study area (See Figure 10). If the subject property is excluded, the study area has 1222.7 acres of which 407.17 acres or 32.3% is planted. Of this amount, 388 acres are planted in avocados and 19 acres are planted in flowers and exotic plants. 815.53 acres or 66.7% of the study area is currently not used for productive agriculture.

In terms of the subject property, essentially all of the area is devoted to agriculture.

The subject property currently has a larger percentage of land under cultivation (100%) than the remainder of the study area (32.3%). The proposed development will directly affect 18.74 acres or 7.14% of current agricultural uses (See Subsection F). When these 18.74 acres are subtracted from the 262.5 acres currently used for agriculture, there will be, after implementation of this project, a total of 243.76 acres of agriculture remaining. This also equates to 92.86% of the subject property remaining in agriculture. Accordingly, the percentage of land devoted to agriculture in the surrounding area is 32.3%. Thus even after the implementation of the project, the percentage of land devoted to agriculture on the subject property will be nearly three times as high as the surrounding area.

F. Agricultural Areas Directly Affected by the Proposed Development:

A review of the area to be graded in terms of building pads, driveways, fuel breaks, biological open space easements, roads, and fire zones was conducted to determine the amount and type of agriculture that would be directly affected by the proposed development.

Although this proposal is dependant upon septic tanks and the associated leach fields, the area occupied by the septic tanks and leach fields was not considered a direct effect. This was done pursuant to Appendix G of the CEQA Guidelines which, in discussing an evaluation of Agricultural Resources, suggests the following questions:

Would the project

- a) Convert Prime Farmland, Unique Farmland, or Farmland of State of Statewide importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural use?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

A and c above relate to the conversion of agricultural land to a non-agricultural use. The surface above the leach fields can continue to be used for agricultural purposes as long as root crops such as potatoes or carrots are not grown and, in fact, are highly suitable for agriculture because of the additional moisture and nutrients that will be in the soil. Therefore, placement of leach fields on the subject property will not result in the conversion of any lands to a non-agricultural use, and thus the leach fields were not considered a direct effect to agriculture.

Additionally, the Fire Plan calls for a "Zone A" around the perimeter of the pads. This Zone does not permit the growing of citrus or avocados, but does permit other types of agriculture. Areas within this zone were not considered direct impacts to agriculture since the area is not lost to agricultural use.

Biological open space easements were considered direct impacts, but the biological buffer was not. This is because all of the buffer areas fell within existing agriculture, which could remain as long as the agricultural use was continued.

It was found that the total direct effects to agriculture on the subject property would be approximately 18.74 acres or 7.14% of the agriculture found on the subject property. (See Figure 11).

After the subdivision, the remaining avocado grove on site will be divided among the individual subject property owners and each owner will be responsible for their portion of the grove. The existing well will come under the ownership of that individual who purchases the subject property where it is now located. All other parcels will be provided with water from the Fallbrook Public Utilities District. The existing irrigation system will be

left in tact except for alterations needed to operate the system on individual parcels, with connections to the imported water.

Thus, as stated in Sub-section E above, after the direct effects to agriculture are taken into account, there will still be 92.86% of the subject property devoted to agriculture.

G. Feasibility of Maintaining Agriculture with Imported Water

The agriculture on this subject property is currently sustained by groundwater. However, after the development of this project, only the parcel with the existing well would use groundwater, with the other parcels connected to the Fallbrook Public Utilities District water lines. Figure 12 is a table representing the costs of producing avocados on this subject property versus yield and profit. The water quantity estimates were obtained from Dr. Eric Bender of the University of California Cooperative Extension, while the water costs were obtained from the Fallbrook Public Utilities District. Current avocado pricing was obtained from the Avocado Hotline in Fallbrook as of March 23, 2007. The pricing was set at \$.90/pound, which was an average of the range in market prices. Other costs of production were obtained from the University of California Cooperative Extension Publication entitled Avocado Sample Establishment and Production Costs and Profitability Analysis for San Diego and Riverside Counties. Costs did not include land costs or subject property taxes in that the avocado production on the properties would be a secondary use to the residential use on these properties. Finally, the yield per acre of 7250 pounds per acre was also taken from this publication as the average yield for avocado production in San Diego County.

As can be seen from Figure 12, a purchaser of one of these parcels can expect to yield a net profit of \$867.04 per acre per year by continuing to produce avocados even with imported water. There are 262.5 acres of agriculture currently on this subject property, of which 18.4 acres will be affected. This leaves 243.76 acres of agriculture remaining. When this amount is divided among the 9 parcels, there is an average of 27.42 acres of agriculture per proposed parcel. At a profit of \$867.04 per acre, a parcel, on an average, would show a profit of \$22,883.00 for avocado production, even with the use of imported water.

It is the conclusion of this analysis that not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be a strong economic incentive for future owners to continue the avocado production.

## H. Soils

### Soil Conservation Service:

The U.S. Department of Agriculture, Soil Conservation Service has prepared a Soil Survey for San Diego County. According to this survey two major soils types comprise 77.37% of the soil formations within the study area (See Figure 13) and they are described below. Five additional soils types occupying less significant amounts of acreage within the study area will also be discussed.

- AcG: Located in the northern, western and southwestern portions of the study area, this Acid Igneous Rock Land occupies 602.79 acres or 49.29% of the study area. This soil formation also occupies 51.66 acres or 19.67% of the subject property. This soil is not listed as an arable soil by the Soils Survey. According to the survey, this soil is used for wildlife habitat and watershed. The Capability Rating is VIII-1 (19, 20, 30).
- CmrG: Located in the south-central portion of the study area, this Cieneba Very Rocky Coarse Sandy loam soil occupies 343.48 acres or 28.08% of the study area. This soil formation also occupies 210.92 acres or 80.33% of the subject property. This soil formation has major rock outcrops and large granite boulders on 50% of the surface, and is not considered to be an arable soil by the Soils Survey. Runoff is very rapid, and erosion is rated as being a "very high" hazard. The Capability Rating for this soil is VIIIs-8 (19).
- CIE2: Located in the northern and northeast portions of the study area, this Cieneba Coarse Sandy loam soil is eroded on hilly 15-30% slopes. It occupies 47.39 acres or 3.88% of the study area and is not found on the subject property. This soil is rated as "Fair" for Avocados, but is not suitable for Citrus, Truck Crops, Tomatoes or Flowers. The fertility of this soil is rated as "Low" and the permeability rate is "Rapid". The Capability Rating for this soil is VIe-1 (19).
- CIG2: Located in the eastern portion of the study area, this Cieneba Coarse Sandy loam soil is eroded on steep 30% to 65% slopes. Runoff is rapid to very rapid, and the erosion hazard is high to very high. It occupies 65.64 acres or 5.37% of the study area and is not found on the subject property. This soil is rated as "Fair" for Avocados, but is not suitable for Citrus, Truck Crops, Tomatoes or Flowers. The fertility of this soil is rated as "Low" and the permeability rate is "Rapid". The Capability Rating for this soil is VIIe-1 (19).

Rm: Located in the eastern portion of the study area, this "Riverwash" soil occurs in intermittent stream channels. It occupies 44.67 acres or 3.65% of the study area and is not found on the subject property. This soil is typically sandy gravelly, or cobbly, and has no value for farming or ranching.

CmE2: Located in the northern portion of the study area, this Cieneba rocky coarse sandy loam is eroded on slopes of 9-30%. It occupies 42.22 acres or 3.45% of the study area and is not found on the subject property. This soil is not rated as an arable soil by the Soil Conservation Service.

StG: Located in the eastern portion of the study area, this Steep-gullied land is eroding into old alluvium or decomposed rock. Runoff is very rapid, and the erosion hazard is very high. This formation occurs as large individual gullies or as a network of many gullies in areas where the vegetative cover is sparse or has been severely depleted by grazing or fires. This soil occupies 25.33 acres or 2.07% of the study area and is not found on the subject property. This soil is not rated as an arable soil by the Soil Conservation Service.

There are 7 soil formations that occupy 96.6% of the study area. Of these 7 formations, 5 soils are considered not suitable for agriculture. These soils occupy 86.54% of the study area and 100% of the subject property. Of the arable soils, two are rated fair for avocados but not suitable for citrus or other crops

Thus 90.35% of the study area including the subject property has soils rated as not arable. The soils in the remaining 9.65% of the study area are rated fair for avocados and not suitable for other crops. Thus in terms of term of the Soil Conservation Service Survey, the soils in the study area are generally very poorly suited for agriculture.

In terms of fertility, again 7 of the predominant soils, occupying 88.9% of the study area are rated as not suitable for agriculture. The 2 soils occupying the other 11.1% of the study area are rated as medium to low and low in fertility. Thus in terms of the Soils Conservation Service Survey, the large majority of soils in the study area are not suitable for agriculture. Those that are suitable are rated low or low to medium.

In terms of the subject property, 100% of the soils are rated as not suitable for agriculture. None of the soils within the study area are listed as prime farmland soils or farmlands of statewide importance soils.

I. Important Farmlands:

The California Department of conservation has classified land in California into seven "Important Farmlands Categories." Annotated definitions of the relevant classifications are found below.

**Prime Farmland:** Land with the best combination of physical and chemical characteristics able to sustain long-term production of agricultural crops.

**Farmland of Statewide Importance:** Land with a good combination of physical and chemical characteristics for agricultural production, having only minor shortcomings, such as less ability to store soil moisture, compared to prime farmland.

**Unique Farmland:** Land used for production of the state's major crops on soils not qualifying for prime or statewide importance. This land is usually irrigated, but may include nonirrigated fruits and vegetables as found in some climatic zones in California.

**Farmland of Local Importance:** Land that meets all the characteristics of prime and statewide, with the exception of irrigation.

**Urban and Built-up Land:** Residential land with a density of at least six units per ten-acre parcel, as well as land used for industrial and commercial purposes, golf courses, landfills, airports, sewage treatment, and water control structures.

**Other Land:** Land which does not meet the criteria of any other category.

There are also Categories of Grazing Land, Other Land, and Water that have not been defined.

Figure 14 indicates the 3 Important Farmland Categories found on the subject property and the surrounding area, with green representing Unique Farmland, yellow representing Farmlands of Local Importance, and gray representing Other Lands. Additionally these Categories are discussed below in relation to the study area.

#### Unique Farmland:

473.73 acres or 38.77% of the study area is in the Unique Farmland Category. This Category is found primarily in the west and central portions of the study area. 258.66 acres or 98.95% of the subject property lies within this Category.

18.74 acres of the Unique Farmland on the subject property is being directly impacted. This leaves 243.76 acres or 92.86% of Unique Farmland that will be available for future agriculture. This figure includes land within Area A of the Fire Protection Plan, in that this area is not lost to all forms of agriculture.

#### Farmland of Local Importance:

90.01 acres or 7.44% of the study area is in the Farmlands of Local Importance Category. This category is found in the west central portion of the study area. 2.74 acres or 1.05% of this Farmland is found on the subject property.

#### Other Land:

657.25 acres or 53.79% of the study area is in the Other Land Category. This Category is found primarily in the east and southern portions of the study area. None of the subject property is within this Category.

The first two Important Farmlands Categories are clearly the most suitable for agriculture. However, neither of these Categories, including Prime Farmland, is found within the study area or on the subject property. Additionally, 53.79% of the study area is not categorized as agricultural land. The Unique Land Category is placed upon land which does not meet the requirements of Prime Farmland or Farmland of Statewide Importance, but is under cultivation. Thus to qualify as Unique Land, the land need only be under or have a history of cultivation. Additionally, 92.86% of the Unique Farmland will be available for future agriculture after implementation of this development.

In accordance with the rating of the soils types in Section H above, the suitability of the subject area for agriculture would fall in the medium to low range at best. Finally, none of the soils in the study area are rated as prime farmland or farmland of statewide importance.

J. Micro Climate:

Information for Micro Climates in San Diego County is contained in the Climates of San Diego County Agricultural Relationships, published by the University of California Agricultural Extension Service. At the time of the publication of this document, the nearest Weather Reporting Station to the Subject property was Fallbrook. This Weather Station is located approximately 6.4 miles to the south of the Subject property.

The closest Weather Station to the subject property is Fallbrook, but a complete record is not available for this Station. The next closest Weather Station is the Vista Weather Station. The Vista Weather Station indicates an annual average maximum mean temperature of 74 degrees with an extreme high of 107 degrees and an extreme low of 27 degrees. This Station also reported an average rainfall of 16.62" with 8.61" coming during the months of January, February and March. The estimated date of the first freeze from the Fallbrook Weather Station was December 1<sup>st</sup> and the last estimated freeze is February 1<sup>st</sup>.

Thus, the mildness of the microclimate of this area would be advantageous to the growing of semi-tropical crops.

K. Facilities:

Imported Water is available from the Fallbrook Public Utilities District.

L. San Diego County Avocado Production:

The County of San Diego County Department of Agriculture, Weights and Measures produces an annual report regarding Crop Statistics for San Diego County. According to the 2008 report, there are 26,549 acres planted with avocados in San Diego County, which is an increase of 485 acres over the 2007 totals.

This proposal will directly affect .07% of the County's avocado plantings and none of the County's nursery and flower plantings. Thus this reduction in production represents only a minute portion of the avocado production in San Diego County, and thus will not result in any substantial decrease in terms of total County production.

M. Sustainability of Agriculture on Smaller Parcels in San Diego County:

A memorandum from the Department of Agriculture, Weights & Measures to the Department of Planning and Land Use dated June 2, 1997 addresses the issue of the viability of commercial agriculture on 2-acre parcels and specifically addresses citrus. Recent discussions with the sending Department indicate that the statements made in the memorandum are still valid today. Some of the statements made in this memorandum pertinent to this issue are as follows. All of the figures quoted are as of June 2, 1997.

- There are currently 671 citrus farms of two or fewer acres in San Diego County.
- There are citrus farms as small as .1 acres.
- There are 4,298 small farms in San Diego County which are less than 9 acres.
- The average farm size in San Diego County has been falling and is currently only 21% of the average farm size statewide.
- In San Diego County only 36% of the farmers list farming as their primary occupation, versus 52% statewide and 54% nationwide.
- The cost of land in San Diego County makes it prohibitive for many new farmers to begin an operation on a large parcel, so the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

Thus not only is agriculture proven to be viable on smaller parcels in San Diego County, but, due to the cost of land, is likely to be critical to the continued success of agriculture in San Diego County. The creation of parcels planned in the proposed development may play a small part in enhancing the future of agriculture in this County.

N. History of Smaller Parcels in this Portion of De Luz and Fallbrook:

Figure 16 was prepared to examine the relationship between smaller parcels in this vicinity of De Luz and North Fallbrook. This Figure shows parcels under 20 acres which are currently in agricultural use. 20 acres was used because is it the smallest size classification on the County GIS parcelization maps which would include the proposed parcel sizes. The result was that 312 Parcels in the area shown on Figure 15 within the bold

lines are shown as having an agricultural use and are under 20 acres in size. In total this represents 2581 acres in the vicinity having agriculture on smaller parcels. Additionally, the above referenced parcels have an average size of 8.27 acres.

Thus, not only is agriculture viable on smaller parcels in San Diego County in general, but the same appears to be true for this portion of De Luz and Fallbrook. Accordingly the creation of parcels that have an average of 21.2 acres will not have an adverse effect to agriculture, and may even enhance the possibility of agriculture remaining on this subject property.

O. Pesticides

Pesticide users are required to register with the County and keep pesticides confined to the subject property on which they are being used with no significant drift. The drift of pesticides can be harmful for adjacent agricultural uses as well as residential uses. Pesticides that drift onto adjacent crops can then show up in the fruit of that crop. If the adjacent owner has not registered for using that pesticide, that owner could be cited for a pesticide violation and the crop lost. Additionally the drift could bring a pesticide in contact with a plant that could be harmed by the pesticide.

Thus it is important that a pesticide user confines the substance to his subject property and uses them responsibly, whether it is used for agriculture or residences.

Additionally, the parcels of the subject property have existing agriculture that is very likely to stay after the parcels are sold. Thus there is a possibility that the new owners of the parcels will be also using pesticides, and be more tolerant of odors that may be caused by any drift.

Thus the subject property will not result in a conflict between pesticide use and future residents.

P. Subject property Disclosure Ordinance:

The San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist near to subject property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.

Thus anyone purchasing a parcel of this development must be notified of the near agricultural uses and the potential for irritations and inconveniences.

Q. The LESA Model

The California Land Evaluation and Site Assessment Model has been developed by the California Department of Conservation, Office of Land Conservation. This Model is a methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process.

The results of the application of this model to the subject property, as well as the supporting worksheets, are provided in Appendix A. According to this model, a final score under 40 points is not considered significant, and a score of 40-59 is considered significant only if both the Land Evaluation and Site Assessment score are more than 20. The final score for the subject property is 28.1575, and the Land Evaluation is below 20. Therefore the final score is well below the threshold established by the State of California for a finding of significance.

### III. CUMULATIVE IMPACTS

Section 15130(a) of the State CEQA Guidelines states that cumulative impacts of a project should be discussed when the project impacts, even though individually limited, are cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

The following questions are listed in the CEQA Guidelines, Appendix G and are to be considered in evaluating cumulative agricultural impacts. The first three questions have been previously addressed in this report, while the last question will be addressed in detail in this Section.

1. *Would the project convert prime farmland, unique farmland, or farmland of statewide importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California resources Agency, to nonagricultural use?*

None of the area is rated as Prime Farmland or Farmland of Statewide Importance. 258.66 acres or 98.95% of the subject property, is categorized as Unique Farmland with the remainder categorized as Other Land. Additionally, all of the soils of this classification have been rated as not suitable for agriculture by the Department of Soil Conservation.

The amount of agricultural area to be directly affected by fuel breaks, pads, cut and fills, and roads and driveways totals approximately 18.74 acres. There are presently 262.5 acres devoted to agriculture and this project will result in a 7.14% loss of the agriculture now existing on the subject property. Thus 92.86% of the agriculture now existing on the subject property will not be directly affected by the development (See Chapter II, Section G for a discussion on the economic feasibility of maintaining agriculture on smaller parcels).

Accordingly, there will be a conversion of 18.74 acres of Unique Farmland to Non-Agricultural Use. This is 7.14% of the Unique Farmlands existing on the subject property, leaving 92.86% of the Unique Farmland available for future agriculture. Thus the determination has been made that the conversion of unique farmland due to this subject property is not a significant effect to agricultural resources of San Diego County.

2. *Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?*

There is an agricultural use regulation on the subject property as well on the surrounding subject property. However, this use regulation is not an exclusive agriculture zone, and it permits a variety of other uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it.

Additionally there are no parcels within the study area subject to a Williamson Contract.

3. *Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use?*

The conclusion of this analysis is that changes in the existing environment, which, due to their location or nature, will not result in the conversion of farmland to nonagricultural use.

This conclusion is based upon the following points.

- a. The surrounding area has few advantages for the use of agriculture other than the microclimate.

None of the soils on the subject property are rated as prime agricultural soils or Soils of Statewide Importance. 90.35% of the soils in the study area are rated as not suitable for agriculture. The other 9.65% of the study area consists of two soils that are rated as fair for avocados and not suited for citrus or flowers. In terms of fertility, the two soil types suitable for agriculture are both rated as low to medium.

258.66 acres or 98.95% of the subject property, and 473.73 acres or 38.77% of the study area is categorized as Unique Farmland. 657.25 acres or 53.79% of the study area is categorized as Other Land, which is primarily non-agricultural land. As defined in this program, Unique Farmland is simply land that does not qualify as Prime Farmland or Farmland of Statewide Importance, but has a history of cultivation and is usually irrigated. Thus to qualify as Unique Farmland it is only necessary that there be a history of cultivation.

- b. Only a limited amount of the agriculture on the subject property will be directly affected, and the remaining agriculture will be at a higher ratio than the surrounding subject property.

The amount of agricultural area to be directly affected by fuel breaks, pads, cut and fill, and roads and driveways totals approximately 18.74

acres. There is presently 262.5 acres devoted to agriculture and this will result in a 7.14 % loss of the agriculture now existing on the subject property. After the proposed project, 92.86% of the subject property will be devoted to agriculture. This is a much higher proportion of agricultural use than the surrounding area that has 33.29% of its area in agriculture.

To assist in the continuation of agriculture, the existing irrigation system will be left in tact except for alterations needed to operate the system on individual parcels, with connections to the imported water. Chapter II, Section G discusses the economic viability of using imported water versus groundwater for the potential parcels.

Thus 92.86% of the agriculture now existing on the subject property will not be directly effected by the development. Additionally, the percentage of agriculture on this subject property will still be considerably higher, even after development, than the percentage in the surrounding area. Since the proportion of land devoted to agriculture on the subject property after development will be the same as that of the surrounding area, such development will not result in a stimulus to the significant conversion of other agricultural lands or as a deterrent to the continuation of agriculture in this area.

- c. The average size of the parcels being proposed is capable of sustaining agriculture and may enhance the future of agriculture on this subject property.

It has been stated by the San Diego County Department of Agriculture and Weights and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size and over 4,000 small farms under 9 acres. They further state that the average size farm is falling and that only 36% of the County farmers list farming as their primary occupation. Finally they state that the cost of land in this County makes it prohibitive to begin an operation on a large parcel and that the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

An analysis of the cost versus revenue for maintaining agriculture on these properties indicates that profit on these parcels could be in the neighborhood of \$867.04 per acre. Thus not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be a strong economic incentive for future owners to continue the avocado production.

Figure 16 was prepared to examine the relationship between smaller parcels in this vicinity of De Luz and North Fallbrook. This Figure

shows parcels under 20 acres that currently have an agricultural use. 20 acres was used because is it the smallest size classification on the County GIS parcelization maps which would include the proposed parcel sizes. The result was that 312 Parcels in the area shown on Figure 16 above the bold line are shown as having an agricultural use and are under 20 acres in size. In total this represents 2581 acres in the vicinity having agriculture on smaller parcels. Additionally, the above referenced parcels have an average size of 8.27 acres.

The smaller parcels being created may enhance the retention of agriculture because the groves will have an aesthetic value as well as a purely economic value and are likely to be maintained, even if they should be no longer profitable. This would also be true as a reason for having individual subject property owners responsible for maintenance of agriculture on their parcels.

4. *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

As a part of the agricultural analysis, a study was done to determine if this project, combined with other projects in the vicinity, would have an effect that is cumulatively considerable. This was determined by reviewing projects that have been recently approved or are contemplated to be approved in the near future, and adding the results to the effects of the subject property.

#### A. Methodology:

An area was chosen that would function as a cumulative study area. The boundaries of this area were established by reviewing features of the landscape, which may isolate agricultural in this vicinity from other agricultural areas in the county. These landscape features were primarily major areas of steep slope that would separate agricultural areas, major areas where no agricultural activity was taking place, and areas that had had substantial urban development.

The cumulative study area was superimposed on the San Diego County GIS Discretionary Permit Map. This map indicates major and minor subdivisions, Major Use Permits, General Plan Amendments (GPA's), and Plan Amendment Authorizations (PAA's) both requested and approved since approximately January of 1999. (For purposes of this study, this set of discretionary permits will be referred to as "Selected Projects".) This results in a gross number of selected projects of any type in the study

area. In this way the selected projects could be identified that had been approved and were contemplated over the last 7.5 years.

A map of the cumulative study area was overlain with the County Vegetation Map to determine which of the selected projects identified in the study area were ones that occurred on lands used for agriculture. To make this determination, any selected projects occurring on vegetation classified as agriculture or developed and disturbed land was considered. Disturbed and developed land was considered because the land may have originally been in agriculture, with the developed classification being a result of the selected projects. Since the GIS Map only used points to identify projects, any selected projects even remotely close to agriculture or urban vegetation types was considered.

The next step was to identify those previous and contemplated selected projects that are occurring on land currently used for agriculture that have or would have an effect on principal farmlands within the cumulative study area. (For purposes of this study, the term principal farmlands" are those land referenced in question one of the CEQA Guidelines, reproduced on the first page of this Section. These lands would include Prime Agricultural Lands, Agricultural Lands of Statewide Importance, and Unique Farmlands per the California Department Important Farmlands Map 2002). This was done by overlaying the cumulative study area with the appropriate portions of the important farmlands map. Selected projects not within a principal farmland were also eliminated from consideration. As above, the GIS Map only used points to identify projects. Therefore selected projects even remotely close to principal farmlands was considered.

The plot plans and maps for those selected projects meeting both of the above tests were then obtained from the County Project Processing Center. The maps were then superimposed on the vegetation and farmlands maps to determine the principal farmlands in agriculture that were affected. The effects to the subject property could then be added to the approved and proposed agriculture lands affected through selected projects. This could be compared with the land in agriculture for the County as a whole. In this way a determination could be made if the cumulative impact of the selected projects in the cumulative study area was having a considerable cumulative impact to agriculture in San Diego County as a whole.

It should be noted that where agricultural studies have been previously done, the effects were taken directly from that report. Where agricultural studies have not been previously done or located, the entire area of the selected projects within agriculture and a principal farmland was

considered, even though it is possible that only a small part of that area was actually receiving a direct effect.

The data within this report was based upon the County GIS Discretionary Permit Map dated November 10, 2010. It is understood that prior to the public hearing, the discretionary permits may be reviewed in light of updated maps. At that point, it will then be decided if there are changes which warrant disclosure to the decision making body.

B. The Cumulative Analysis:

The subject property is located in the southeast part of the Pendleton-DeLuz Subregional Planning Area. A cumulative study area was established which is some 14,348 acres in size and is shown on Figure 17. All boundaries were based on topographical divisions with the exception of the northwest, which was the boundary of any type of extensive agriculture.

The cumulative study area occupies the eastern half of the privately held area of the Pendleton/De Luz Subregional Planning Area as well as the extreme northwestern part of the Fallbrook Planning Area. The County General Plan shows regional categories of Estate Development (EDA) over approximately 95% of the area and Environmentally Constrained Area (ECA) over the remaining 5% where there are County Agricultural Preserves established. The General Plan Designation for this area is primarily (18) Multiple Rural Use with a small area of (17) Estate along the western boundary. Within the Fallbrook area, the subject property has a plan designation of (20) General Agricultural.

Zoning in this area is primarily light agricultural with minimum parcel sizes of 4 and 8 acres. The subject property within the Fallbrook Planning Area currently has a 10 acre parcel size because of the (20) Plan Designation.

A majority of the cumulative study area is vacant with a scattering of estate homes on large lots. There is a significant amount of agriculture occurring in the west central area, and in the northeast and southeast. The agriculture is mostly avocados with some flowers and tropical plants.

The impact of avocados coming into the United States from Chile and Mexico on a year round basis has not been fully assessed. However, the California Avocado Commission anticipates that the price per pound of California Avocados will drop a small amount during the present reporting year. This could result in the continued maintenance of existing groves, but limited new plantings.

Water is currently provided through groundwater or by the Fallbrook Public Utilities District, and its costs and availability have been impacted by the recent drought conditions.

Climate in this region is similar to the rest of Coastal San Diego County with slightly more rainfall. Its mild nature is the primary reason for the agriculture that exists in the cumulative study area.

Most of the soils in the cumulative study area are classified as "other soils" by the California Department of Conservation. There are large areas of unique farmland, located where there agriculture exists, and a very small amount of Prime Farmlands and Farmlands of Statewide Importance. Generally the quality of soils in this area is poor to medium or non-arable.

After reviewing selected projects which met the criteria described under "Methodology" it was determined that the subject property and 1 additional selected project was occurring on lands that were being used for agriculture and were on a principal farmland as previously defined. Appendix B has a listing of the initial group of selected projects, those in agricultural or urban vegetation types, and those having one of the three Farmlands classifications. There were no Major Use Permits, General Plan Amendments, or Preliminary Plan Authorization which met the stated criteria. The other selected project, TPM 20736, affects 9.44 acres of principal farmlands. Thus absent the subject property there are 9.44 acres of principal farmlands affected. When included with the 24.29 acres of the subject property, there is an effect of 33.73 acres in the Cumulative Study Area.

Figure 18 indicates the location of the other selected project within the cumulative study area.

C. Agriculture in San Diego County:

According to the Department of Conservation, the following acreages of principal farmlands existed as of 2008:

Prime Farmland	7,753
Farmland of Statewide Importance	10,411
Unique Farmland	51,975
Total	70,139

This represents a reduction of 2,323 acres or 3.2% in principal farmlands between 2006 and 2008. The 2009 Crop Statistics and Annual Report of the County of San Diego Department of Weights and Measures (the latest statistics available) indicate that within this period (from 2006 to 2008) there was a reduction of 2530 acres in agricultural lands or .8%. Thus while there was a decrease in the principal farmlands, the County is experiencing a lower loss in overall agricultural acreage.

D. Conclusion

The result of the development of the subject property will be to create lots sizes similar to or larger than the planning and the zoning in the cumulative study area require. Additionally, the agricultural orientation of the area will be maintained, with the development of the subject project having no negative effects on the remainder of the area.

The parcels proposed for the subject property, including the Boundary Adjustment average 29.16 acres. This is more than adequate to provide for continuing agriculture on the parcels, as indicated by the cost analysis within this report. Additionally, as also shown in this report, there are a large number of smaller parcels within De Luz which continue to be used for agriculture. Thus there is a high probability that most of the agriculture use on the subject property itself will continue, and as such, should not affect ongoing agricultural operations in the cumulative study area.

The main determinants of the future of agriculture in the cumulative study area will be the competition from Latin American fruit and water availability and costs. In this case the home sites being established by the subject project will have an advantage over the larger commercial operations, because the groves will have an aesthetic value and also will not have to amortize the cost of the land, whose primary use is a home site. Therefore the avocados on the proposed lots, as with the other parcels in De Luz where the grove is a part of a home site, will likely continue beyond the time that the commercial groves are no longer profitable.

In terms of a cumulative impact to the cumulative study area the subject property will have minimal effects. The parcels are sized so they are consistent with the development that has taken place and agriculture will continue where it exists today. They are also consistent with other lots in the cumulative study area which are currently supporting agriculture. Additionally, in the face of foreign competition, the smaller parcels may even have an advantage over large commercial operations.

In terms of cumulative impacts to San Diego County, the subject property affects 24.29 acres of the principal farmlands or .035% of all of these acres. Adding the additional selected project meeting the parameters of

this study amounts to a cumulative total of 33.73 acres. This amounts to a total of .048% of the principal farmlands in the County.

With such small percentages, there is clearly not a cumulatively considerable impact to agricultural resources to San Diego County as a result of the approval of the subject project.

#### IV. ANALYSIS OF IMPACTS

It has been determined that due to the characteristics of the subject property as well as the surrounding area, there will not be a significant impact to agricultural resources as a result of the implementation of this project. This is based upon an assessment of the threshold standards established in Section I as well as other points as described below.

##### Thresholds of Significance:

1. The project will result in the conversion of:

- a. Prime agricultural soils (i.e. an LLC rating I-II or soils rated as good in terms of fertility and suitability for the predominant crop in the vicinity).

*None of the soils on the subject property are rated as prime agricultural soils. None are rated as good in terms of suitability for avocados, citrus, or flowers. 100% of the soils are rated as not suitable for agriculture. Thus none of the soils are rated as good in terms of suitability for the crops in the vicinity and none are rated good in terms of fertility. Thus this threshold has not been exceeded.*

- b. Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

*None of the soils are rated as Prime Farmland or Farmland of Statewide Importance. 258.66 acres or 98.95% of the subject property is categorized as Unique Farmland with the remainder categorized as Other Land with a small amount of Farmland of Local Importance. As defined in this program, Unique Farmland is simply land which does not qualify as Prime Farmland or Farmland of Statewide Importance, but has a history of cultivation and is usually irrigated. Thus to qualify as Unique Farmland it is only necessary that there be a history of cultivation. Additionally, the Farmland of Local Importance has no soils of prime farmland or soils of farmland of statewide importance. Additionally all of the soils of this classification have been classified as not suitable for agriculture by the Department of Soil Conservation.*

*The amount of agricultural area to be directly affected by fuel breaks, pads, cut and fills, and roads and driveways totals approximately 18.74 acres. There is presently 251.18 acres devoted to agriculture and this project will result in a 9.9% loss of the agriculture now existing on the subject property. Thus 90.1% of the agriculture now existing on the*

*subject property will not be directly affected by the development. Additionally, 24.29 acres of the Unique Farmland will be impacted, leaving 233.77 acres or 90.38% of the Unique Farmland available for future agricultural use.*

*None of the soils are prime farmland soils and 100% of the soils on the subject property are rated as not suitable for agriculture. While 98.95% of the subject property is rated as Unique Farmland, this is simply a result of the cultivation now existing on the property, and is not a strong indicator of the quality of the agricultural resource. Additionally, only 18.74 acres of the 251.18 acres devoted to agriculture will be converted, leaving 92.54% of the agricultural land intact. Thus the determination is that this threshold has not been exceeded and the project will not result in significant effects in terms agricultural land conversion.*

2. The Project will establish parcel sizes that cannot support future agricultural operations and are not consistent with other parcel sizes in the vicinity that currently support agriculture.

*The project proposes, including the Boundary Adjustment, an average lot size of 29.17 acres, with a minimum parcel size of 20 acres. It has been stated by the San Diego County Department of Agriculture, Weights, and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size and over 4,000 small farms under 9 acres. They further state that the average size farm is falling and that only 36% of the County farmers list farming as their primary occupation. Finally they state that the cost of land in this County makes it prohibitive to begin an agricultural operation on a large parcel and that the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.*

*An analysis of the cost versus revenue for maintaining agriculture on these properties indicates that profit on these parcels could be in the neighborhood of \$867.04 per acre. Thus not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be an economic incentive for future owners to continue the avocado production.*

*Additionally a review of a map showing parcels and vegetation clearly shows that not only does agriculture thrive on smaller parcels in this area, but almost all of the agriculture is located on such smaller parcels.*

*Thus, not only is agriculture viable on smaller parcels in San Diego County in general, but the same appears to be true for this portion of De Luz and Fallbrook. Accordingly the creation of smaller parcels on the subject*

*property will not have an adverse effect to agriculture, and may even enhance the possibility of agriculture remaining on this property. Both by a determination by the County Department of Agriculture, Weights, and Measures and a review of parcels in the vicinity indicate that the average parcel size of 29.17 acres and the smallest parcel of 20 acres are capable of supporting agriculture in the this area. Additionally, this residual agriculture is likely to remain, since the owners of the smaller parcels are likely to place a value on the aesthetics of the groves as well as an economic value, and there will be more incentive to keep the agriculture than now exists.*

*This incentive also favors the responsibility for the maintenance of the agriculture to individual homeowners. A Homeowner's Association will look upon the grove as an economic asset or liability and is likely not to continue maintaining the grove should it not become economically viable, while an individual owner will have a more personal interest in maintaining his/her portion of the grove.*

*The existing well will come under the ownership of that individual who purchases the property where it is now located. All other parcels will be provided with water from the Fallbrook Public Utilities District. The existing irrigation system will be left in tact except for alterations needed to operate the system on individual parcels, with connections to the imported water.*

*Thus the determination is that this threshold has not been exceeded and the project will not result in significant effects in terms of supporting agriculture.*

3. The project will result in a conflict in the study area with agricultural zoning or use regulations.

*There is an agricultural use regulation on the subject property as well the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of other uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it. Thus the determination is that this threshold has not been exceeded and the project will not result in significant effects in terms of conflicts with agricultural zoning.*

4. The project will result in a conflict in the study area with a County Agricultural Preserve.

*There is an agricultural use regulation on the subject property as well the surrounding property. However, this use regulation is not an exclusive agriculture zone, and permits a variety of other uses. There is no use proposed for the project that would not be permitted in the agricultural zones surrounding it. Thus the determination is that this threshold has not been exceeded and the project will not result in significant effects in terms of conflicts with agricultural zoning.*

6. The density proposed by the project will have an adverse significant effect on surrounding agricultural uses in terms of the introduction of residential uses into an agricultural area.

*The amount of agricultural area to be directly affected by fuel breaks, biology easements, pads, cuts and fills, and roads and driveways totals approximately 24.29 acres or 9.9 % of the 251.18 acres of agriculture currently existing. Thus 232.44 acres or 92.54% of the agriculture on the subject property will remain. At present, 33.2% of the surrounding area is in agriculture. Thus after the proposed development there still will be a much higher percentage of the subject property used for agriculture than in the surrounding area.*

*As stated in the previous section, it has been indicated by the San Diego County Department of Agriculture and Weights and Measures that there are over 600 citrus farms in San Diego County under 2 acres in size, and over 4,000 small farms under 9 acres. They further state that the average size farm is falling and that only 36% of the County farmers list farming as their primary occupation. Finally they state that the cost of land in this County makes it prohibitive to begin an operation on a large parcel and that the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.*

*Additionally, a review of this area in De Luz and Fallbrook indicates that agriculture is remaining on smaller parcels, and that almost all the agriculture in the area occurs on smaller parcels. Also, since the owners of the smaller parcels are likely to place a value on the aesthetics of the groves as well as an economic value, there will be more incentive in keeping the agriculture than now exists.*

*Finally, an analysis of the cost versus revenue for maintaining agriculture on these properties indicates that profit on these parcels could be in the neighborhood of \$867.04 per acre. Thus not only would continued avocado production on the proposed parcels be feasible on the proposed properties, but there would be an economic incentive for future owners to continue the avocado production.*

*To assist in the continuation of the agricultural use, the existing irrigation system will be left in tact except for alterations needed to operate the system on individual parcels, with connections to imported water.*

*It then follows that if there is still significant agricultural activity occurring on the subject property, the likelihood of conflicts between the subject property and the agricultural operations on the surrounding area will be minimized.*

*In addition, the proposed parcels of the subject property are larger in size 47% of the parcels that now exist in the study area. Thus parcels in the size range of the parcels proposed by this project are not uncommon in this area.*

*Finally, the San Diego County Board of Supervisors, on February 12, 2003, amended the San Diego County Code of Regulatory Ordinances to require purchasers to be notified in writing that agricultural uses may exist nearby property that the buyer is purchasing. The buyer must acknowledge by signature that such agricultural uses are likely to be nearby that may expose the buyer to certain irritations and inconveniences.*

*Effects to agriculture in the surrounding area will also be limited because 92.54% of the agriculture is likely to remain, the parcels proposed are not unusual in size in the surrounding area. Thus the determination is that this threshold has not been exceeded and the project will not result in significant effects in terms of adjacent agricultural uses.*

7. A significant proportion of the existing agriculture on the subject property will be directly affected through building pads, roads, or driveways.

*The amount of agricultural area to be directly affected by pads, cut and fills, and roads and driveways totals approximately 18.74 acres. There is presently 251.18 acres devoted to agriculture and this will result in a 7.46% loss of the agriculture now existing on the subject property, with 92.54% of the agriculture not directly affected by the development. Thus the determination is that this threshold has not been exceeded and the project will not result in significant effects in terms of direct agricultural effects.*

8. This project, in conjunction with other existing and proposed projects, would have an effect on agriculture that is cumulatively considerable pursuant to the State CEQA Guidelines.

*The subject property affects 24.29 acres of the principal farmlands or .035% of all of these acres in San Diego County. The additional subdivision meeting the parameters of this study affects 9.44 acres, which, added to the subject property, amounts to a cumulative total of 33.77 acres. This amounts to a total .048% of these acres in San Diego County.*

*With such small percentages, there is clearly not a cumulatively considerable impact to agricultural resources as a result of the approval of the subject project.*

9. Application of the LESA Model indicates that the proposal will have a significant impact to agricultural resources.

*The California Land Evaluation and Site Assessment Model has been developed by the California Department of Conservation, Office of Land Conservation. This Model is a methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process.*

*The results of the application of this model to the subject property, as well as the supporting worksheets, are provided in Appendix A. According to this model, a final score under 40 points is not considered significant, and a score of 40-59 is considered significant only if both the Land Evaluation and Site Assessment score are more than 20. The final score for the subject property is 28.1575. Therefore the final score is well below the threshold established by the State of California for a finding of significance.*

## V. FIGURES

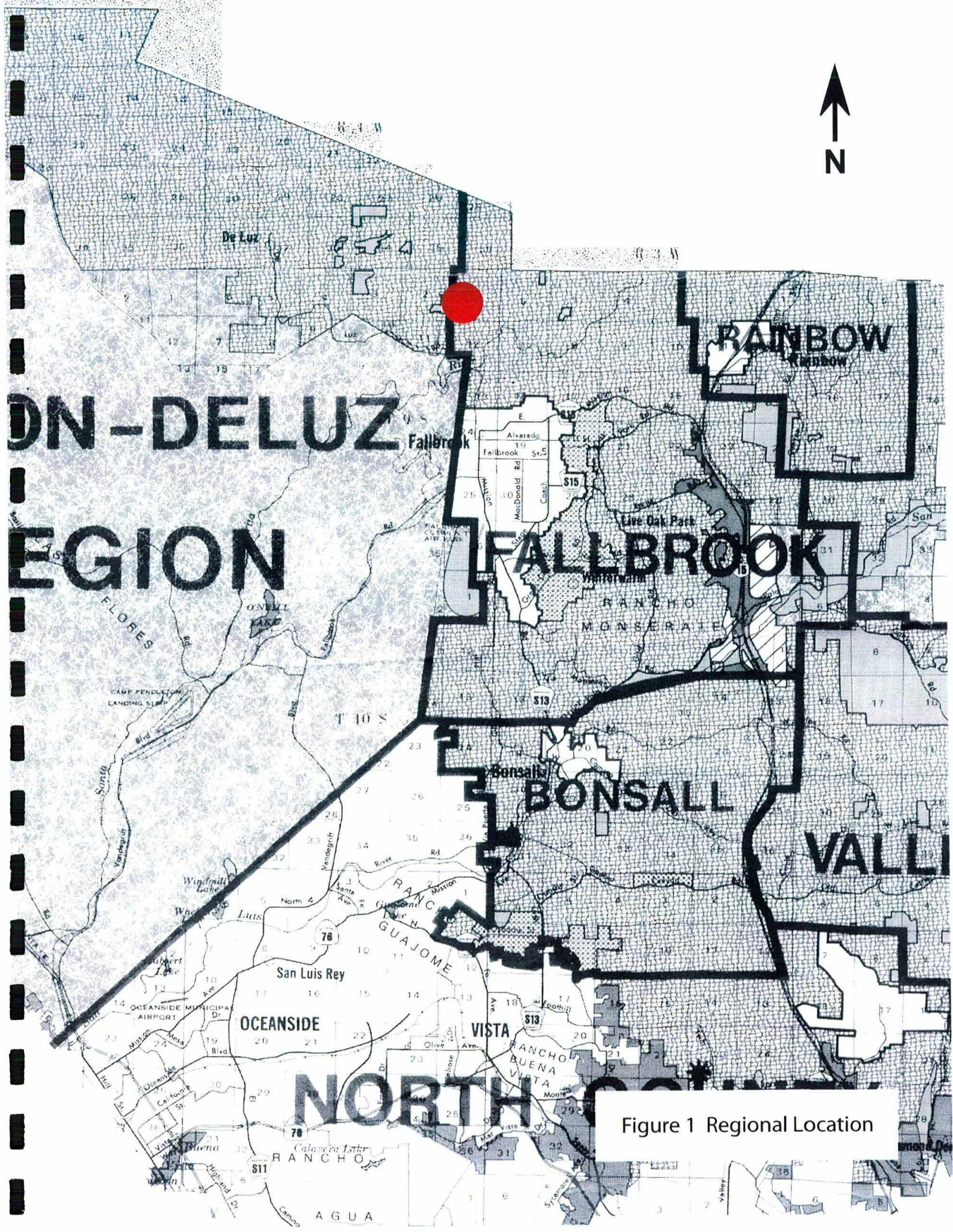


Figure 1 Regional Location

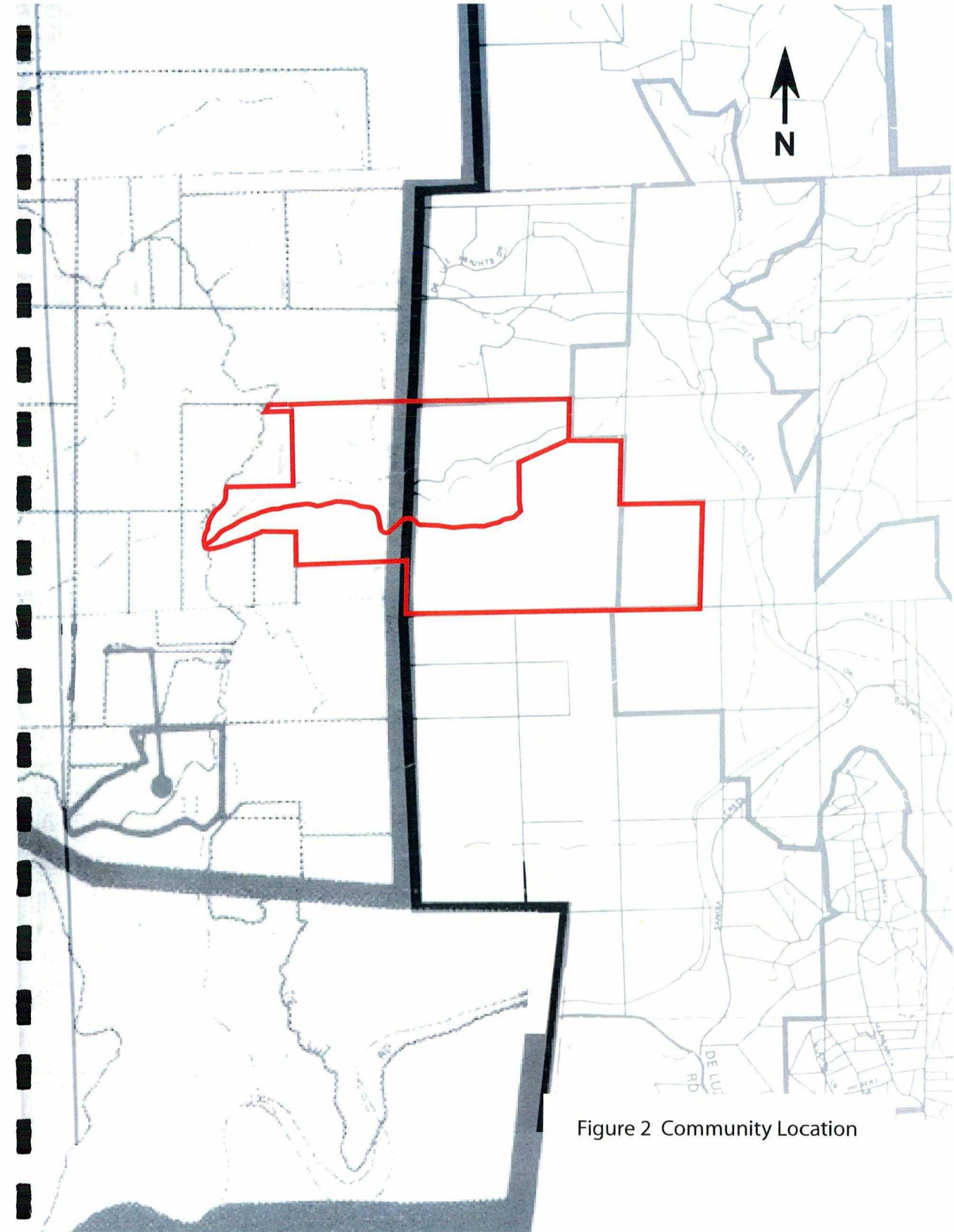


Figure 2 Community Location

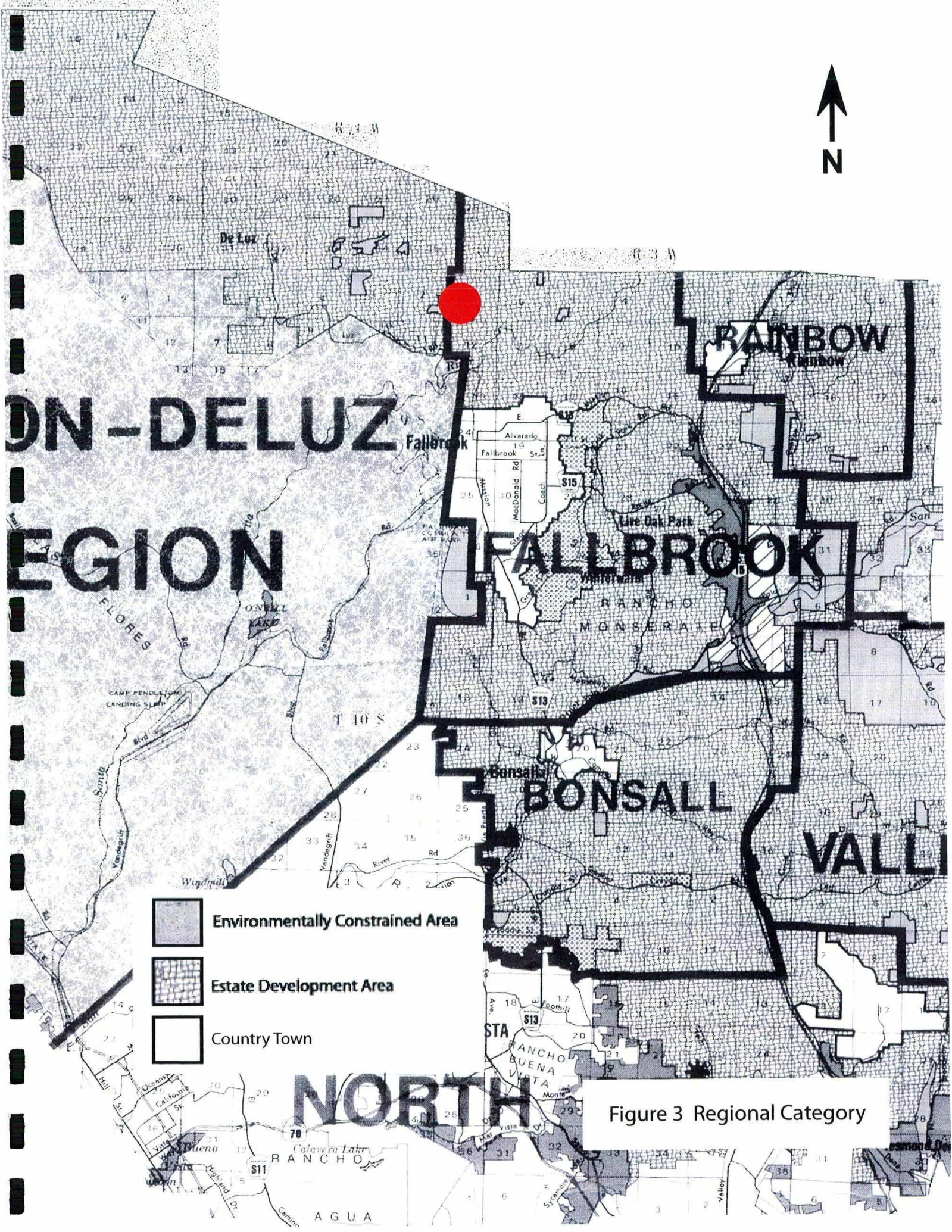


Figure 3 Regional Category

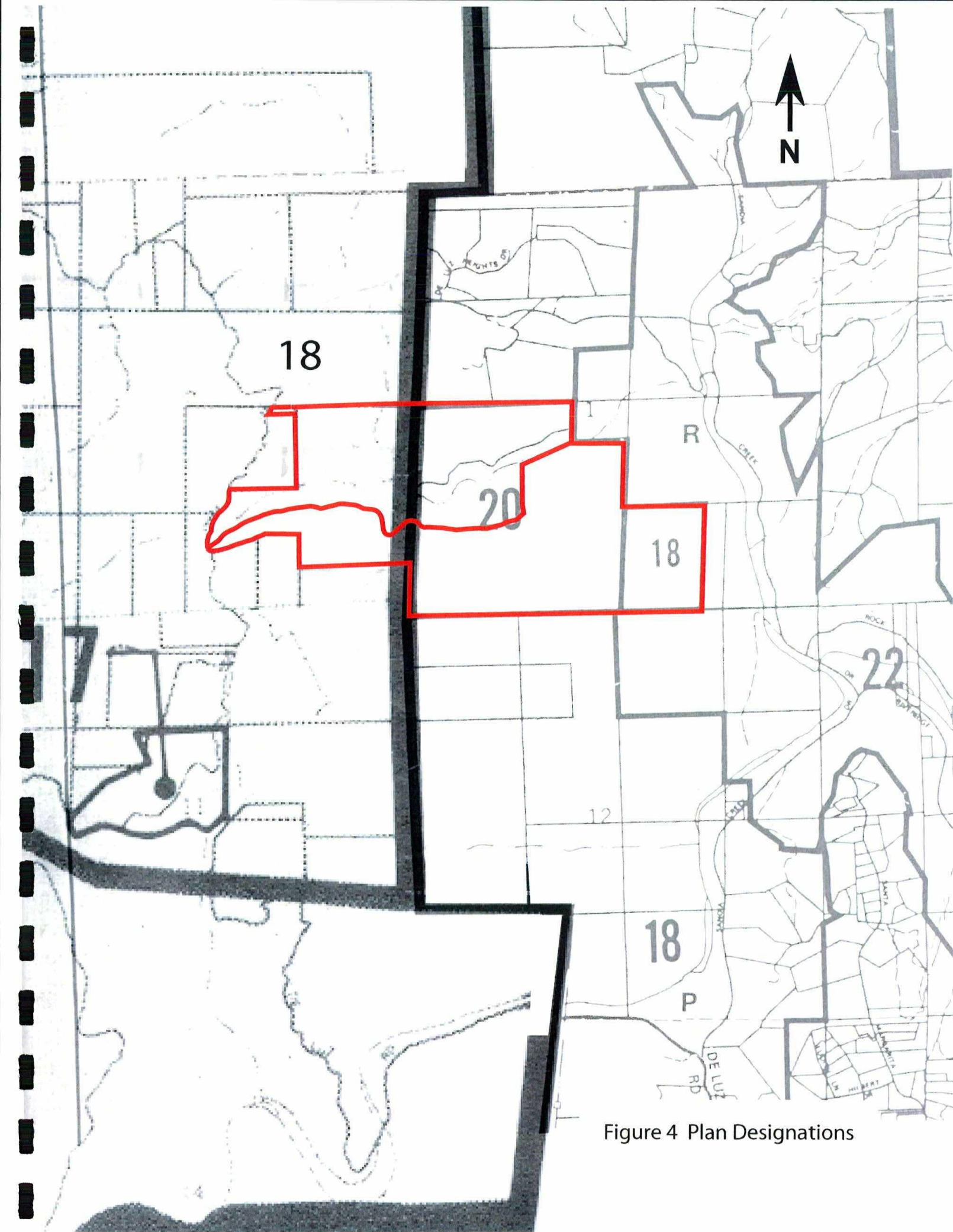


Figure 4 Plan Designations



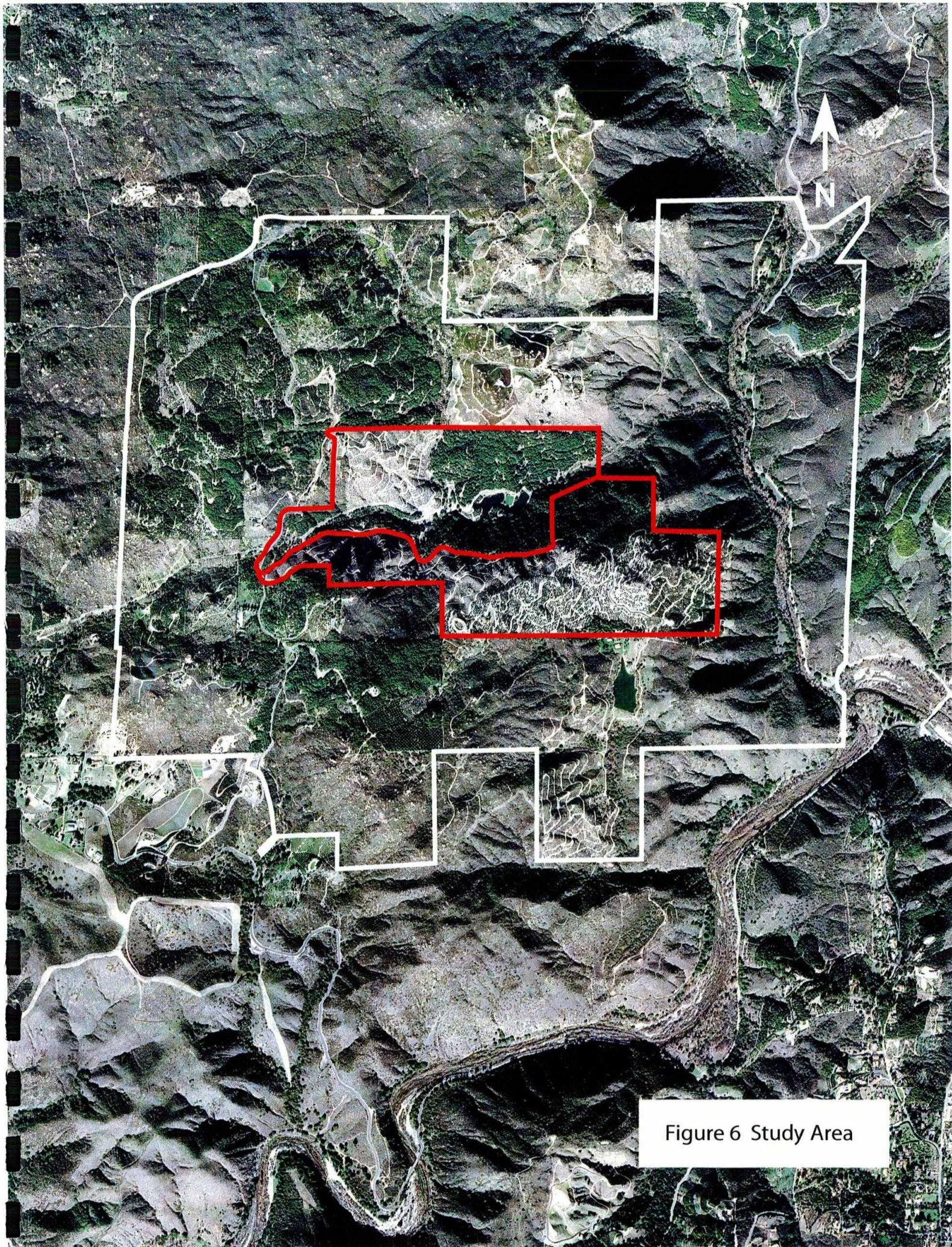


Figure 6 Study Area

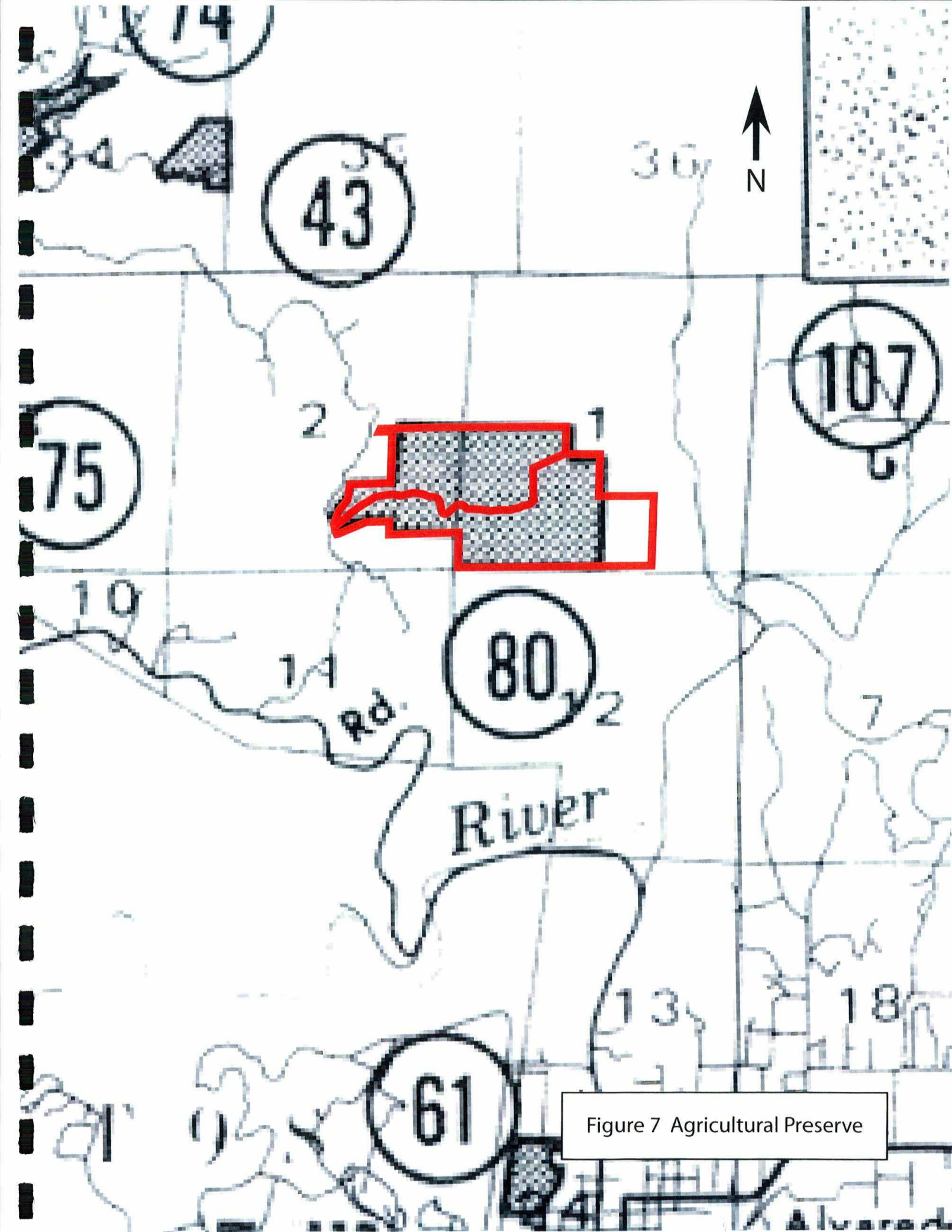


Figure 7 Agricultural Preserve

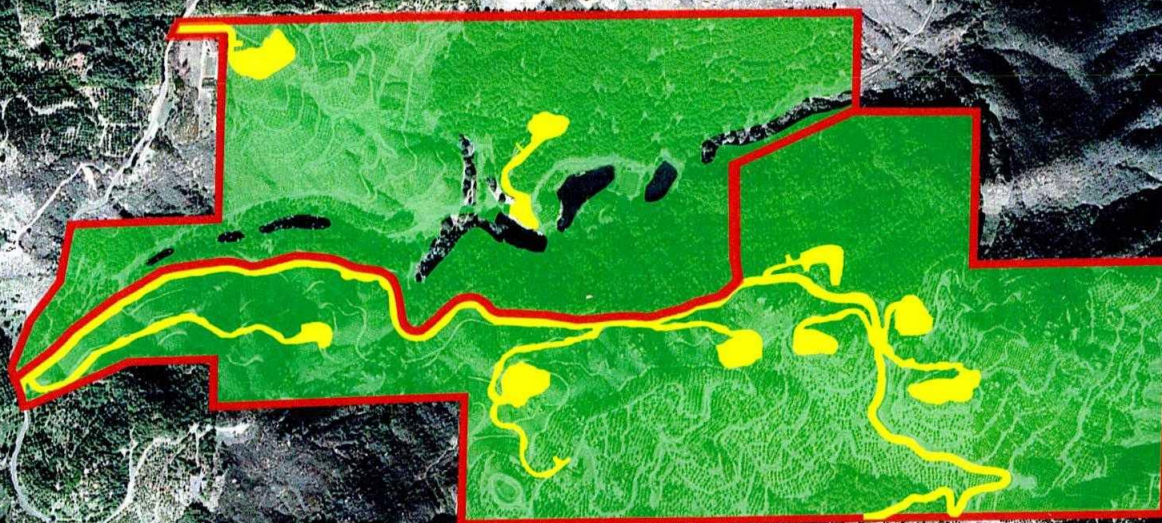
## PARCEL SIZE TABLE

Acreage Classification	Number of Parcels	Percentage
Less than 1 Acre	0	0%
1-2 Acres	0	0%
2-4 Acres	0	0%
4-8 Acres	1	2%
8-20 Acres	20	46%
20+ Acres	23	52%
<b>TOTAL</b>	<b>44</b>	<b>100%</b>

Figure 8 Parcel Size Table



Figure 9 Parcel Sizes



 Avocados

Figure 11 Direct Impacts to Agriculture

## Figure 12 FEASIBILITY TABLE

### PRODUCING AVOCADOS WITH IMPORTED WATER

#### Revenue per acre

Gross revenue per acre (7250 pounds @ \$.95/pound)	6887.50
--	---------

#### Expenses per acre

Water (3.5 acre feet or 1,140,479 gallons @ \$2.63/1000 Gallons)	2999.46
---	---------

Erosion control	10
-----------------	----

Weed control	114
Round-Up	6
Weed Whip	

Pruning	429
---------	-----

Pollination	84
-------------	----

Pest Control	285
--------------	-----

Pest Control Advisor	60
----------------------	----

Fertilizer	141
------------	-----

Picking (\$.16/pound)	1160
-----------------------	------

Hauling (\$.004/pound)	29
------------------------	----

CAC Assessment	254
----------------	-----

CDFA	7
------	---

Water Service Charge per acre	77
-------------------------------	----

Other Overhead Costs (see sheet 2 for details)	<u>442</u>
--	------------

Costs including imported water per acre	6020.46
---	---------

<b>Net Profit Per Acre</b>	<b>867.04</b>
----------------------------	---------------

FEASIBILITY TABLE  
PRODUCING AVOCADOS WITH IMPORTED WATER

Sheet 2

**Detailed other overhead costs from Sheet 1**

Root Rot Analysis	3
Liability Insurance	37
Leaf Analysis	5
Soil Analysis	5
Sanitation Fee	22
Office Expenses	180
Investment Repairs	91
Tools	31
Irrigation System	<u>68</u>
Total	442

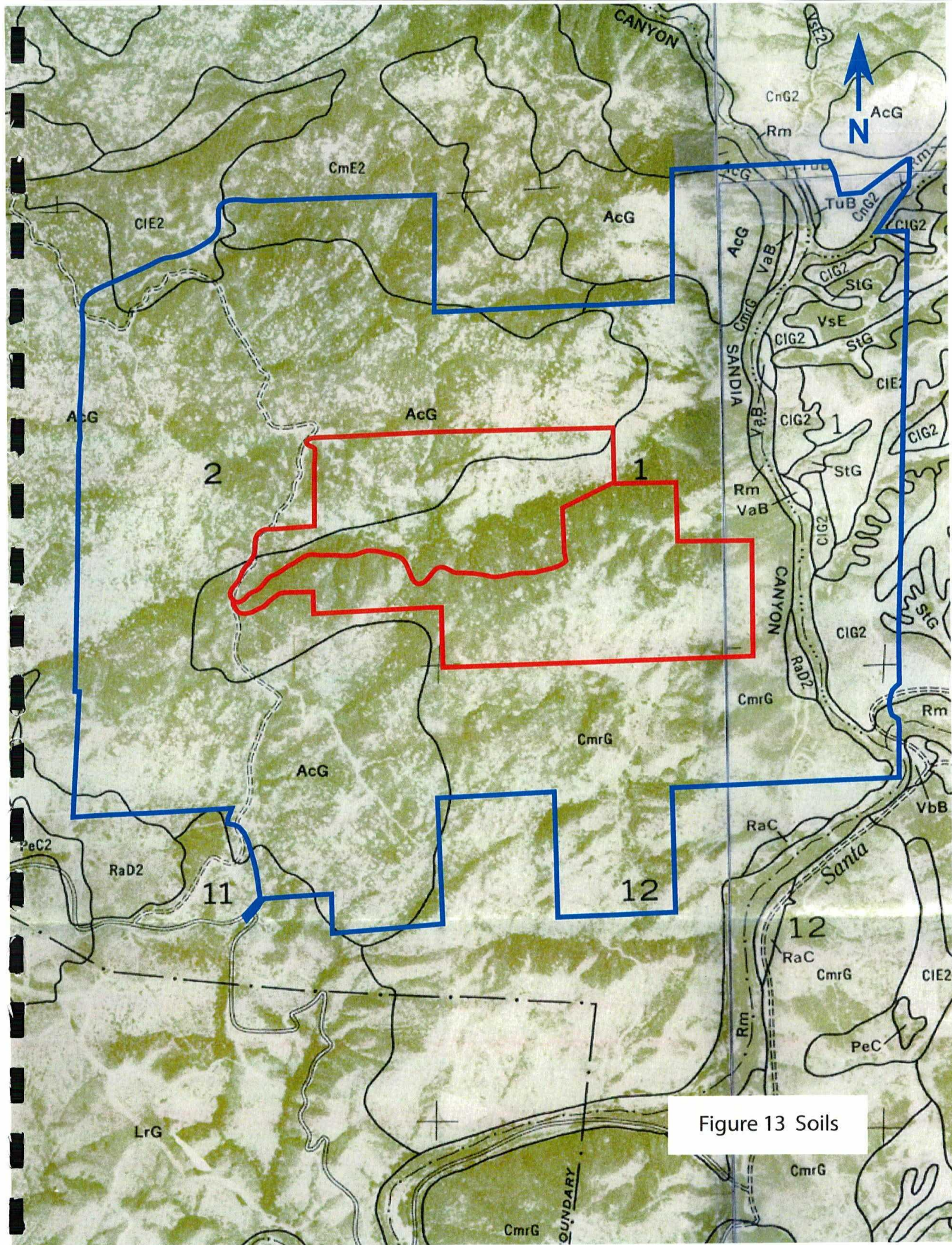
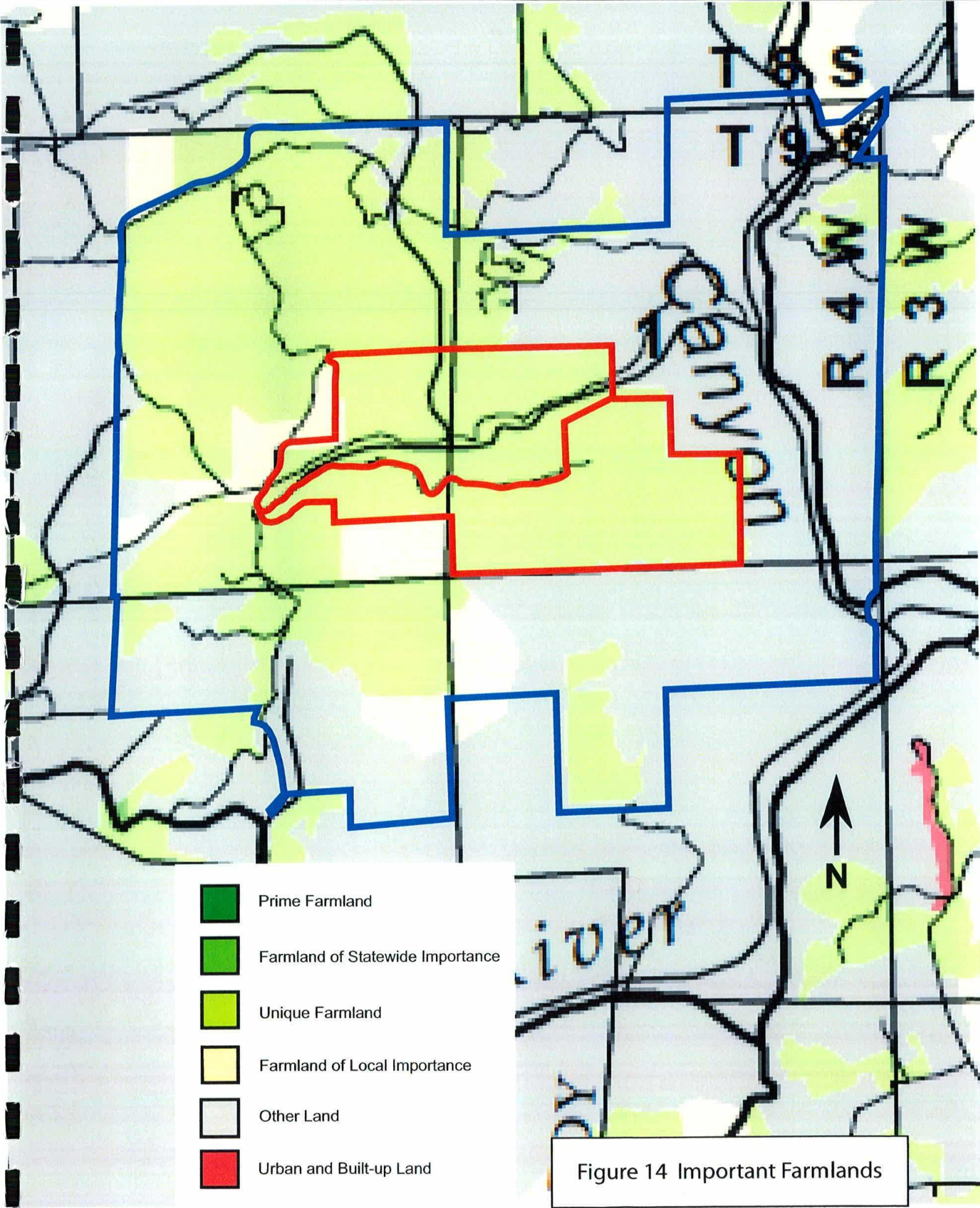


Figure 13 Soils





## County of San Diego

KATHLEEN A. THUNER

AGRICULTURAL COMMISSIONER  
SEALER OF WEIGHTS  
AND MEASURES

DEPARTMENT OF AGRICULTURE, WEIGHTS & MEASURES  
5555 Overland Ave., Bldg. 3, San Diego, CA 92123-1292

AGRICULTURE  
(619) 694-2730  
FAX

WEIGHTS & MEASURES  
(619) 694-2778

June 2, 1997

TO: David Nagel  
Department of Planning and Land Use

FROM: Kathleen A. Thuner

### COMMERCIAL VIABILITY OF TWO ACRE LOTS—TM 5091 (BARRETT/HIBBARD)

Recently you contacted this office concerning the viability of two acre parcels for agriculture in the (19) Intensive Agriculture land use designation. Specifically, you requested information pertaining to the allowance for two acre parcel sizes when "the land is planted, and has been planted, for at least the previous one-year period, in one or more commercial crops that remain commercially viable on two acre lots."

The overall value of citrus per acre in San Diego County in 1996 was \$5,078. For purposes of comparison, the dollar values per acre in San Diego County range from a low of about \$5 (range) to a high of \$588,310 (indoor decoratives).

According to our pesticide operator identification database, citrus farms in San Diego County that have registered to use pesticides are as small as 1/10<sup>th</sup> of an acre. Our records show that there are currently 671 citrus farms of two or fewer acres.

It is also important to note that "commercial viability" does not necessarily imply the ability to support oneself from income solely derived from the farm. Nationwide and in San Diego County as well, farmers traditionally have additional income from other sources. In San Diego County, only 36% of farmers list farming as their primary occupation. In California that figure stands at 52%; nationwide it is 54%.

San Diego County's 1.1 billion dollar agricultural industry is composed of many small farms—4,298 of them are nine or fewer acres. Recent trends indicate that pattern will continue. The average farm size in San Diego County has been falling and is currently only 21% of the average farm size statewide. The cost of land in the county makes it prohibitive for many new farmers to begin an operation on a large parcel, so the ability to farm small parcels is crucial to the success of future agriculture in San Diego County.

I hope this information is helpful. If you have additional questions, please contact Jennifer Tierney of my staff at (S50) 694-3122.

Sincerely,

KATHLEEN A. THUNER  
Agricultural Commissioner/  
Sealer of Weights and Measures

RECEIVED

Figure 15 Memorandum from the Department  
of Agriculture, Weights, and Measures

DEPT. OF PLANNING & LAND USE

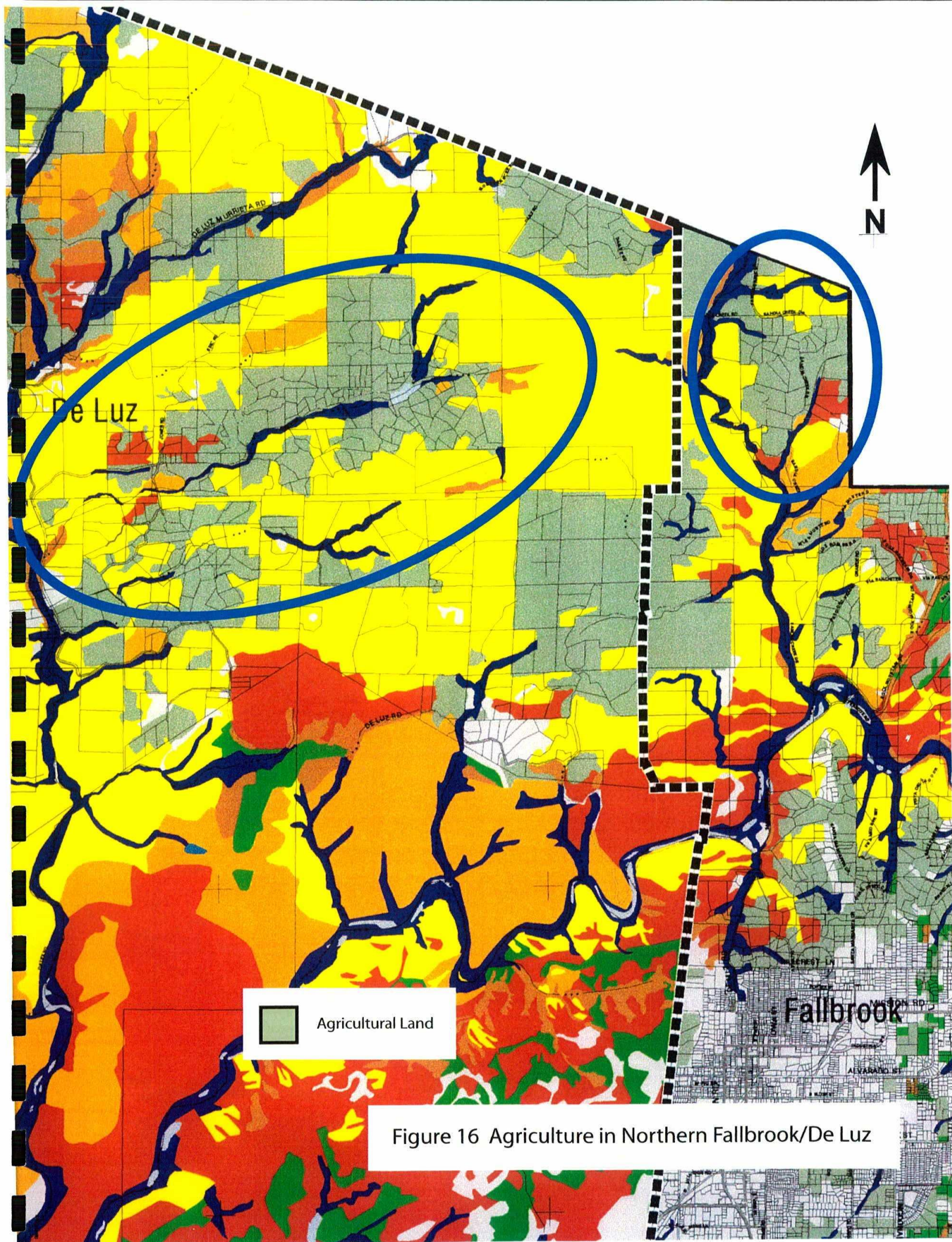


Figure 16 Agriculture in Northern Fallbrook/De Luz

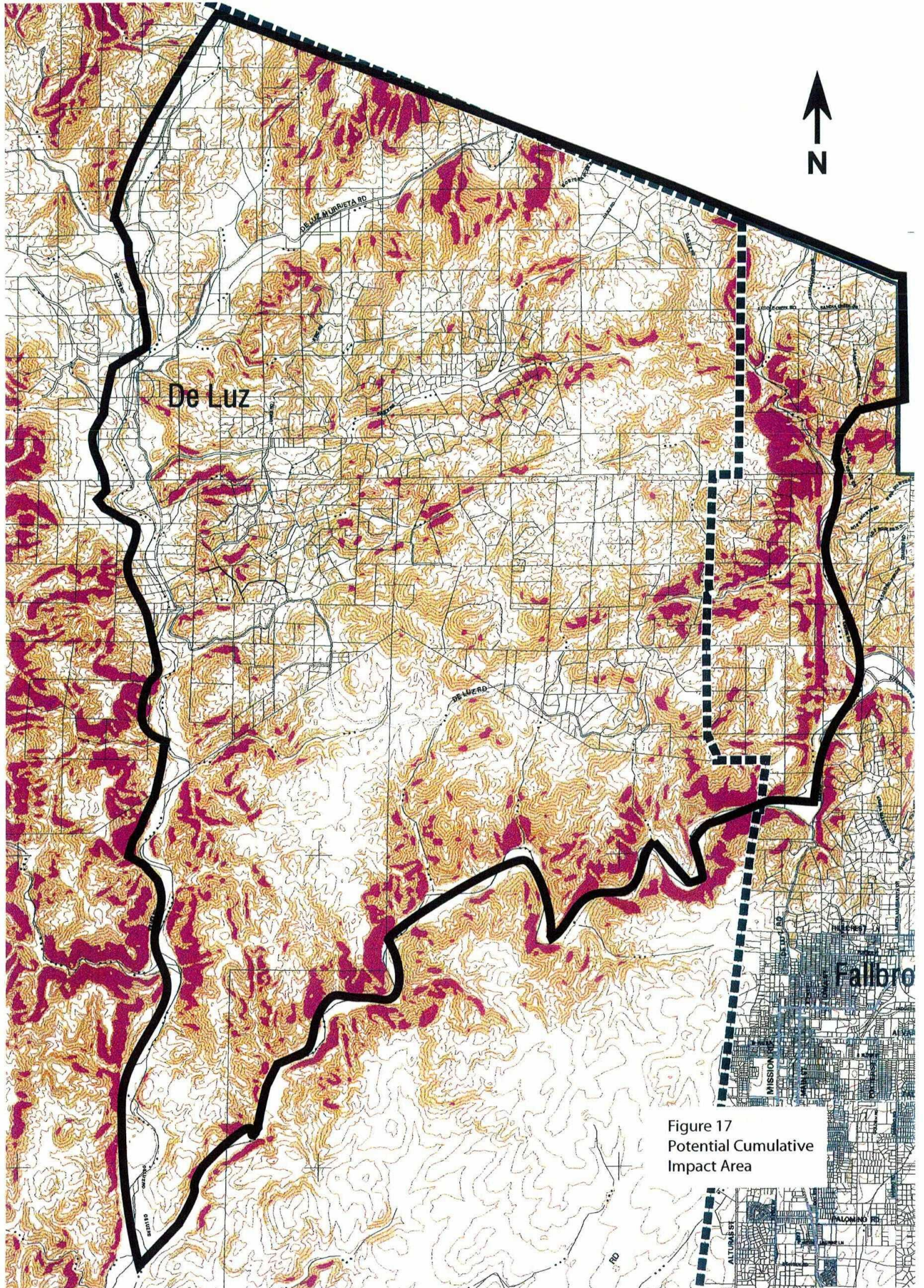


Figure 17  
Potential Cumulative  
Impact Area

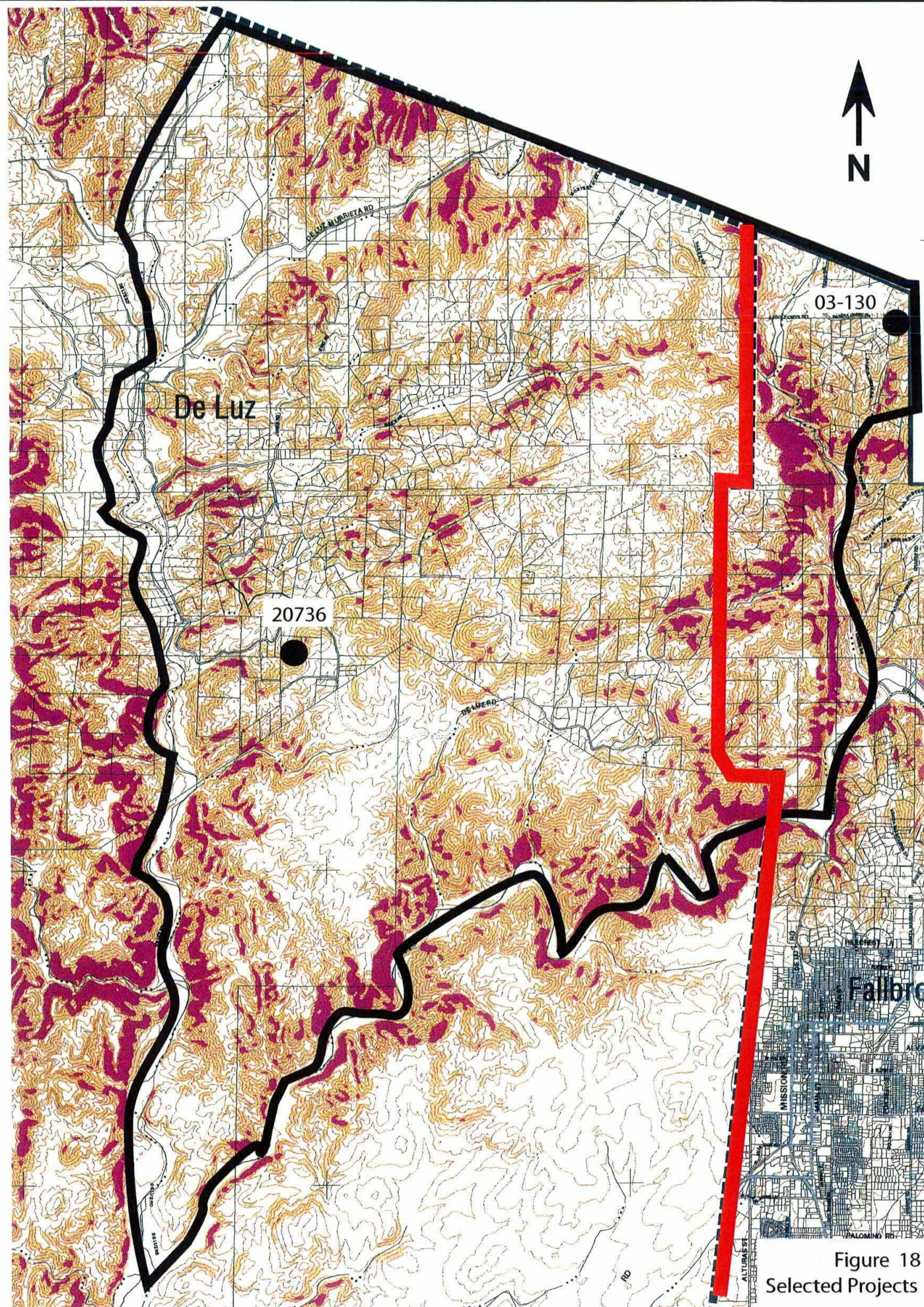


Figure 18  
Selected Projects

## VI. STATEMENT OF QUALIFICATIONS

The following participated in this study:

James Chagala—Principal Planner

Education: B.A. in Sociology  
M.S. in Urban Geography  
Ph.D. in Urban Geography

Experience: 36 years as a professional planner  
2 years Regional Planner with the East-West Gateway  
Coordinating Council  
26 years with Department of Planning and Land Use  
5 years as Chief of the Long Range Planning Division  
10 years as Chief of the Current Planning Division  
12 years as staff to the County Planning Commission  
8.0 years operating a private planning consultant practice  
  
14 years as Adjunct Professor at San Diego State University  
4 years as Adjunct Professor at California State University at San  
Marcos

Placed on the San Diego County Environmental Consultant List in the field of  
Agriculture on November 14, 2001.

Jerry Chagala—Planning Technician

Experience: 5 years as Planning Technician for a private planning consulting  
firm.

Eric Chagala—Planning Technician

Experience: 6 years as Planning Technician for a private planning consulting  
firm

Michael Chagala—Planning Technician

Table 1A

Land Evaluation Work Sheet

Land Capability Classification (LCC) and Storie Index Scores

A	B	C	D	E	F	G	H
Soil Map Unit	Project Acres	Proportion of Project Area	LCC	LCC Rating	LCC Score	Storie Index	Storie Index Score
CmrG	210.91	0.803466667	VII-8-19	10	8.0347	5	4.0173333
AcG	51.65	0.196761905	VIII-1	0	0	10	1.967619
					0		
					0		0
Totals	262.56			LCC Total	8.0347	Storie Index Total	5.9849524

Table 1B

Site Assessment Worksheet 1

Project Size Score

LCC Class I-II	LCC Class III	LCC Class IV-VIII
I	J	K
0	0	262.5
Total Acres	0	262.5
Project Size Score	0	80

Highest Project Size 80

Table 4 Site Assessment Worksheet 2  
Water Resources Availability

A	B	C	D	E
Project Portion	Water Source	Proportion of Project Area	Water Availability Score	Weighted Score
1	Public	1	85	85
2				0
3				0
4				0
5				0
6				0
				0
				0
				0
	Sum	1	Total Resource Score	85

Surrounding Agricultural Land Rating

%	Score
33.3	0

Surrounding Protected Resource Land Rating

Total Acreage	Acreage in % Resource	Score
1485	0.19	0

Table 8 Final LESA Scoresheet

A	B	C	D
Factor Name	Rating Factor	Factor Weighing	Weighted Factor Rating

Land Evaluation

Land Capatilty	8.03	0.25	2.0075
Classification			
Storie Index	5.6	0.25	1.4

Site Assessment

Project Size	80	0.15	12
Water Resource	85	0.15	12.75
Availability			
Surrounding	0	0.15	0
Agricultural Lands			
Protected	0	0.05	0
Resource Lands			

LESA Score 28.1575

Land Evaluation 3.4075

Site Assessment 24.75

## APPENDIX B

Applications filed within the Potential Cumulative Impact Area	Applications on Agricultural or Disturbed Lands	Applications on Agricultural or Disturbed Lands and Classified as on of the Principal Farmlands.
20736	20736	20736
20728	20728	5284*
5284*	5284*	
20448		

\*Subject Property

## REFERENCES

### Written Works:

County of San Diego, Department of Weights and Measures, 2008 Crop Statistics & Annual Report

County of San Diego, Department of Weights and Measures, 2009 Crop Statistics & Annual Report

University of California, Agricultural Extension Service. Climates of San Diego County—Agricultural Relationships, November 1970.

University of California Cooperative Extension. Avocado Sample Establishment and Production Costs and Profitability Analysis for San Diego and Riverside Counties.

United States Department of Agriculture, Soil Conservation Service and Forest Service. Soil Survey San Diego Area, California. December 1973

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance—San Diego County

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. 2006-2008 Land Use Conversion, Table A-26, San Diego County.

[www.Avocado.org](http://www.Avocado.org). Website for the California Avocado Commission.

### Maps:

California Department of Conservation, Division of Resource Protection, Farmland Mapping and Monitoring Program. San Diego County Important Farmland 2004

County of San Diego, Department of Public Works, Mapping Section. Pendleton/De Luz Subregional Area.

County of San Diego, Department of Public Works, Mapping Section. Fallbrook Community Plan.

County of San Diego, Department of Public Works, Mapping Section. County of San Diego General Plan—Regional Land Use Element Map,

County of San Diego, Department of Public Works, Mapping Section. County of San Diego—Agricultural Preserves.

SanGis, County of San Diego General Plan 2020 Reference Maps for De Luz as  
Follows:

Parcelization

Vegetation

Topography

De Luz Discretionary Project Status, July 2009